

**CITIZ**



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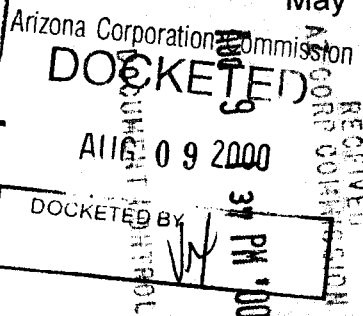
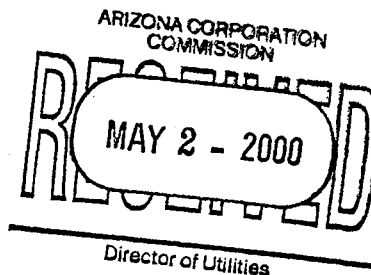
**ORIGINAL**  
**Citizens Utilities Company**

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May 1, 2000

Mr. Del Smith  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007



**Re: 520 NPA Relief Industry Planning**

Dear Mr. Smith:

**DOCKET NO. T 00000F-99 0641**

Citizens supports the recent vote of the 520 NPA Relief Industry Planning Conference to overlay the new area code. The overlay is the least cost solution for rural providers, such as Citizens, as well as for those serving the Tucson corridor. Adopting the decision to overlay the new area code relieves all telecommunications providers from the burden of changing current customers numbers, a costly and time-consuming endeavor, as well as the expenses associated with a geographic split – expenses that ultimately Arizona consumers would bear. Conversion costs associated with a split, at an average of \$35,000 per central office and \$2.00 per directory number, would be substantial to say the least.

Any decision to return to a plan to split the 520 Area Code would be exorbitantly expensive and would unduly burden providers and customers alike. The overlay plan is the most cost-effective, efficient and economic solution. Citizens fully supports the Arizona code-holder's consensus decision to adopt the overlay plan.

Thank you for your consideration in this matter.

Very truly yours,

*Craig A. Marks*

Cc: Ghela Boskovich